

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OGO MANGUM & ASSOCIATES, LLC,

Plaintiff,

v.

EVERBRIDGE, INC.,

Defendant.

Civil Action No.: 1:20-01106-RGA

TRIAL BY JURY DEMANDED

UNOPPOSED MOTION TO STAY
ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff, OGO Mangum & Associates, LLC, by and through undersigned counsel and subject to the approval of this Court, hereby files this Unopposed Motion to Stay All Deadlines and Notice of Settlement, and in support thereof, respectfully shows the Court as follows:

All matters in controversy between Plaintiff and Everbridge, Inc. have been settled in principle. The parties are in the process of memorializing the terms of a written settlement agreement. The parties anticipate that they will be able to perform such terms within forty-five (45) days. Accordingly, Plaintiff respectfully requests that the Court grant a stay of the proceedings between the parties, including all deadlines, until December 31, 2020.

Good cause exists for granting this Unopposed Motion, as set forth above. The motion is not filed for purposes of delay but so that justice may be served.

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with Defendant about the issues presented here. Defendant indicated that it was not opposed to the relief sought herein.

Dated: November 13, 2020

Respectfully submitted,

Of counsel:

CHONG LAW FIRM PA

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been electronically filed using the CM/ECF filing system, which automatically sends email notifications to all counsel of record and which will permit viewing and downloading of same from the CM/ECF system on November 13, 2020.

/s/ Jimmy Chong
Jimmy Chong